

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

SONRAI MEMORY LIMITED,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00167-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

LG ELECTRONICS INC., LG  
ELECTRONICS U.S.A., INC.,

Defendants.

Case No. 6:21-cv-00168-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 6:21-cv-00169-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

DELL TECHNOLOGIES INC.,

Defendant.

Case No. 6:21-cv-00361-ADA

SONRAI MEMORY LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:21-cv-401-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

KINGSTON TECHNOLOGY COMPANY,  
INC. and KINGSTON TECHNOLOGY  
CORPORATION

Defendant.

Case No. 6:21-cv-01284-ADA

SONRAI MEMORY LIMITED,

Plaintiff,

v.

WESTERN DIGITAL TECHNOLOGIES,  
INC.,

Defendant.

Case No. 6:21-cv-01168-ADA

**DECLARATION OF KYLE MCELROY IN SUPPORT OF  
DEFENDANTS' OPPOSED MOTION TO STAY  
PENDING FINAL RESOLUTION OF PLAINTIFF'S MANUFACTURER LAWSUITS**

I, Kyle McElroy, hereby declare as follows:

1. I am over 18 years of age and competent to make this declaration.
2. I am a Vice President in the Legal department at Western Digital Technologies,

Inc. ("Western Digital"). I have worked at Western Digital since 2016.

3. I provide this declaration on behalf of Western Digital. The statements in this declaration are based on my personal knowledge. If called to testify as a witness, I could and would testify competently and truthfully to each of the statements under oath.

4. As Vice President in the Legal department at Western Digital, I have responsibilities relating sales and procurement contracting activities of Western Digital worldwide, which includes Western Digital's memory products in the United States. I have worked on sales contracting activities for Western Digital products for approximately 5 years.

5. Based on the Complaints filed against Western Digital and Dell Technologies, Inc., I understand that Plaintiff is accusing SanDisk/Toshiba 64L 3D NAND flash chips with the die identifier FRN1256G ("Accused Kioxia and Western Digital Chips") of infringing U.S. Patent Nos. 6,724,241 (the "'241 patent") and 7,436,232 (the "'232 patent"). In this declaration, I refer to Accused Kioxia and Western Digital Chips only with respect to those products marketed and sold by Western Digital.

6. Western Digital has sold components that include the Accused Kioxia and Western Digital Chips.

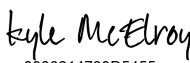
7. Customers of Western Digital have requested that Western Digital defend them against Sonrai's allegations of infringement of the '241 and '232 patents.

8. Western Digital has contractual obligations to defend its customers against the allegations of infringement of the '241 and '232 patents and as such, will and is defending and indemnifying in accordance with those contractual obligations.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Morgan Hill, California, on December 17, 2021.

DocuSigned by:

  
8986214739D5455

---

Kyle McElroy